UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

MDL No. 2875

THIS DOCUMENT RELATES TO ALL CASES

HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

NOTICE OF MOTION TO EXCLUDE THE TESTIMONY OF LEE-JEN WEI, PH.D.

TO: Seth A. Goldberg, Esq.
Duane Morris LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103-4196
Attornevs for Defendants

PLEASE TAKE NOTICE that pursuant to Case Management No. 23 Revised, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Excluding the Testimony of Lee-Jen Wei, Ph.D.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of Madeline E. Pendley and Daniel A. Nigh in support of the Motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

LEVIN, PAPANTONIO, RAFFERTY, ET AL. Attorneys for Plaintiffs

By: /s/ Daniel A. Nigh

Dated: November 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2021, I electronically filed the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

Dated: November 1, 2021

Respectfully submitted:

/s/Daniel A. Nigh

Daniel A. Nigh

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey, P.A.

316 S. Baylen Street, Suite 600

Pensacola, FL 32502 Phone: (850) 435-7013 Fax: (850) 436-6013

Email: dnigh@levinlaw.com